

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF VERMONT

UNITED STATES OF AMERICA)	
)	
v.)	No. 5:18-cr-61-1-2
)	
SAM BENT and)	
DJENEBA BENT,)	
Defendants.)	

DEFENDANT'S MOTION TO EXTEND MOTIONS FILING DEADLINE

NOW COMES the Defendant, Sam Bent, by and through his attorney, Stephanie M. Greenlees, Esq., and hereby moves this Honorable Court for a thirty (30) day extension to the motions filing deadline in the above-captioned criminal proceeding. As grounds for this motion, Defendant states as follows:

The current motions filing deadline in this matter is set for January 3, 2019. Defendant received supplemental discovery from the government on December 20, 2018 and expects to receive additional discovery from the Government which may be relevant to Defendant's pretrial motions. An additional period of thirty (30) days is necessary so Defendant may obtain and review supplemental discovery and prepare and file motions.

Defendant agrees that the deadline for filing motions should be extended and he recognizes that any additional time granted will be excluded from computation under the Speedy Trial Act. 18 U.S.C. §3161(h)(1)(D)(excluding time resulting from filing of motions). The ends of justice will be served by granting this extension as it will provide Defendant the "reasonable time necessary for effective preparation, taking into account the exercise of due diligence." 18 U.S.C. §3161(h)(8)(A).

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Undersigned counsel has communicated with counsel for the Government, Assistant United States Attorney Michael Drescher, regarding this request for an extension of the motions filing deadline. AUSA Drescher has no objection.

WHEREFORE, Defendant respectfully requests that the Court grant this motion to extend the motions filing deadline by thirty (30) days and the attached proposed Order.

DATED at Burlington, Vermont this 31st day of January, 2019.

Respectfully Submitted By,

SAM BENT
By Counsel

KAPLAN AND KAPLAN

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